

CREIZMAN LLC

565 Fifth Avenue
7th Floor
New York, New York 10017
tel: (212) 972-0200
fax: (646) 200-5022
ecreiz@creizmanllc.com
www.creizmanllc.com

By ECF

November 15, 2017

The Honorable Alison J. Nathan
United States District Judge
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *United States v. Yuri Lebedev*, 15-CR-769 (AJN)

Dear Judge Nathan:

I had planned on filing a motion for bail pending appeal on behalf of Yuri Lebedev on or before Monday, November 20, 2017, which will rely significantly on the Court's rulings with respect to the scope of examination of Special Agent Emily Beyer. After the government filed its submission yesterday, I thought that it would serve the interests of efficiency if before the Court ruled on Mr. Gross's application, which relies, in part on the same subject, that the Court consider Mr. Lebedev's submission, which I anticipate will contain additional and different arguments and reasoning than that of Mr. Gross, as well as permit the government to respond to Mr. Lebedev's submission, before the Court issues ruling.

I have contacted counsel for the government and Mr. Gross to discuss this matter and they do not object to my filing Mr. Lebedev's submission on or before Monday, November 20, 2017, with the government, after reviewing that submission, having a reasonable and sufficient time, in their judgment, to respond. I therefore respectfully request that the Court permit me to file Mr. Lebedev's submission on before Monday, November 20, and permit the government a reasonable time, as government counsel deems appropriate, to respond.

I thank the Court for its consideration in this matter.

Respectfully submitted,

/s/ Eric M. Creizman

Eric M. Creizman (EC 7684)